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Sent: Friday, June 26, 2020 4:56 PM

To: J. Ashlee Albies <ashlee@albiesstark.com>; Jesse Merrithew <jesse@lmhlegal.com>; Juan Chavez <jchavez@ojrc.info>

Cc: Reeve, Tracy <Tracy.Reeve@portlandoregon.gov>; Sheffield, Naomi <Naomi.Sheffield@portlandoregon.gov>

Subject: Re: Don't Shoot Portland, et al. v. City of Portland, Case No. 3:20-cv-00917-HZ

Ashlee:

Fifth, with respect to plaintiffs' first paragraph regarding the universe of munitions, my understanding is that PPB does also use "smoke" which we feel is not a use of force and is simply an "obscurant" with no physical effect. Hence, "smoke" should not be part of any TRO. I feel like this was mentioned in a prior conversation but did not see it in any email to my recollection. Also, I understand that pava (synthetic OC) is also used in an OC payload. I don't think this is additional but just want to be clear. We do not have any other chemical irritants that we use to my knowledge.

Give me a call to chat if you like. I'm just waiting for confirmation.

Scott